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November 5, 2020

By ECF

The Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street,
New York, New York 10007

Re: U.S. v. Soto et al, 12-cr-556 (LTS)

Dear Judge Swain:

We are counsel to defendant Anibal Ramos in connection with his motion for compassionate release. We write to request an extension of time, until November 20, 2020, to provide the supplemental information requested by the Court.

On October 14, 2020, the Court instructed counsel to provide supplemental briefing by October 28, 2020 to address or clarify certain issues identified by the Court in connection with Mr. Ramos's motion for compassionate release. Among these issues, the Court requested that counsel explain Mr. Ramos's release plan in the event the Court grants his motion, including whether Mr. Ramos seeks placement in a Residential Reentry Center, where and with whom he plans to reside, and how he proposes to obtain financial support and continuity of medical care.

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On October 27, 2020, we requested a brief extension of time to provide this supplemental information. We explained that although counsel had repeatedly reached out to staff at USP Hazelton, where Mr. Ramos is currently incarcerated, both by phone and by email, to request a call with Mr. Ramos to obtain the requested information, and were told that our request had been sent to Mr. Ramos's unit team and case manager, we had not received any additional follow up from USP Hazelton or spoken with Mr. Ramos.

On October 28, 2020, the Court granted our request for extension of time, directed counsel for defendant to file the supplemental brief by November 6, 2020, and directed the government to submit its reply by November 16, 2020. However, notwithstanding additional outreach to the staff at USP Hazelton, we have received *no* response to our request to speak with our client.

We accordingly request a second extension of time, to November 20, 2020, so that we can continue our outreach to the staff at USP Hazelton and confer with our client to set out a meaningful and well-informed release plan. We further request that the Court order the Executive Assistant and Mr. Ramos's case worker at USP Hazelton to respond to our request and set up a call with Mr. Ramos so that we may formulate a release plan.

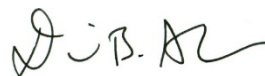
The government does not oppose this request.

The requested extension is granted. Any further response of the Government must be filed by November 30, 2020. The BOP staff at USP Hazelton, including but not limited to the Executive Assistant and Mr. Ramos' case worker, must promptly respond to counsel's request and set a call between Mr. Ramos and his counsel. The Assistant United States Attorney must immediately provide a copy of this order to the Warden of USP Hazelton. DE# 397 resolved.
SO ORDERED.

11/06/2020

/s/ Laura Taylor Swain

Respectfully submitted,



David B. Anders
Michael A. Nance

cc: Counsel of Record (via ECF)